



Sunshine Coast Timber Supply Area Summary of Public Input

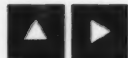
B.C. Ministry of Forests

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Sunshine Coast Timber Supply Area, Summary of Public Input

Sunshine Coast Timber Supply Area

Timber Supply Review

Summary of Public Input

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Sunshine Coast Forest District
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This is a summary of the public input that has been received on the Timber Supply Review in the Sunshine Coast Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.





Background

As part of the review of timber supply in the Sunshine Coast Timber Supply Area, the British Columbia Forest Service distributed the *Discussion Paper* and two technical reports—the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input received during the 90-day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Sunshine Coast Timber Supply Area.

The first section of this summary, Public Review Process and Response, outlines the public review process implemented by the Forest Service and describes the types of public input received. The second section, Public Input, summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Sunshine Coast Forest District office.





Public Review Process and Response

Sunshine Coast District staff actively solicited public input on the Timber Supply Review in the Sunshine Coast Timber Supply Area through the following actions:

- copies of the three documents were mailed to over 125 organizations and businesses within and adjacent to the Sunshine Coast Timber Supply Area. The *Discussion Paper* included a response form that readers were encouraged to complete and return to the district manager
- three open houses, on Cortes Island, Sechelt and Powell River, were advertised in six local newspapers. The dates of the open houses were also included in the direct mail-out of the three documents
- newspaper articles were encouraged

As Table 1 shows, over 150 people participated in the information sessions and open houses. The Sunshine Coast Forest District received 254 written submissions from the public, including substantial critiques from a number of interest groups and individuals. The Sunshine Coast Timber Supply Area Licensees commissioned Timberline Forest Inventory Consultants to critique the *Timber Supply Analysis*. That document is referred to as the "licensee analysis" in this report. Additionally, the Coast Forest and Lumber Association (CFLA) requested E.B. Experts Inc. & Clayton Resources to review the *Timber Supply Analysis* and the *Socio-Economic Analysis*. The resulting report—*Sunshine Coast Timber Supply Area Timber Supply Review Choices for AAC: 1996-2000*—is referred to as the "CFLA report" in this document.

Activities (No. of participants)

Date

Meetings with interest groups

Sunshine Coast Forest Coalition (11)

Nov. 20, 1995

Open Houses

Cortes Island (10)

November 1, 1995

Sechelt (105)

November 6, 1995

Powell River (36)

November 7, 1995

Prior to the 90-day review period, district staff also held numerous meetings and information sessions with local governments, First Nations and various interest groups.

Table 1: Participation in public information activities



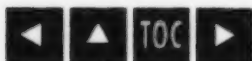


Public Input

In this section, public input on the information presented in the three Timber Supply Review documents for the Sunshine Coast Timber Supply Area is summarized under the following headings:

- Timber Supply Analysis
- Socio-Economic Analysis
- Discussion Paper

Public input on other ongoing government processes that may influence timber supply in the Sunshine Coast Timber Supply Area in the future is summarized at the end of this section.





Timber Supply Analysis





Licensee analysis

The licensee analysis uses a comparable net land base and similar area assignments for species groups and management zones to those used in the Timber Supply Analysis. However, uncertainty around land base and management assumptions and growth and yield modelling is interpreted as providing upward pressure on the allowable annual cut.

- **Model differences**

When Ministry of Forests base case assumptions and data are entered into the licensee model, the resulting harvest flow projection indicates the current harvest level could be maintained for two decades rather than one. The difference is attributed to variation in the workings of the respective models.

- **Differing land base and volume assumptions**

Another projection, incorporating small changes to the land base, the use of special site indexes, and the use of special batch volumes for unmerchantable stands, indicates the current harvest level could be maintained for three decades.

- **Base case recommendation**

The base case projection recommended in the licensee analysis assumes a reaggregation of analysis units and the use of new yield estimates for existing and managed forest stands. The results indicate the current harvest level could be maintained for four decades before starting to decline.

- **Visual quality objectives**

Visual quality objectives, which cover 55 percent of the timber harvesting land base, are a major concern because of their impact on timber supply. The licensee analysis questions the manner in which visual quality objectives are quantified. To model anticipated changes to visual management, the licensee analysis shifts 20 per cent of the area in the Retention zone into Partial Retention, and 20 per cent of the Partial Retention zone into Modification. The results indicate the current harvest level could be maintained for four decades.

If the existing visual quality objectives are maintained, but the maximum allowable disturbance within each visual quality objective zone is permitted, the current harvest level could be maintained for four decades.

- **Old-growth site indexes**

Old-growth site index values likely underestimate future growth. The use of second-growth stands to determine site index is more reliable.

- **Composite harvest flow projection**

The licensee analysis suggests that a harvest flow projection based on the use of special site indexes; revised volume estimates for unmerchantable stands and existing and managed stands; removal of the Tetrahedron from the

productive forest; revised visual quality objectives; and reaggregation of analysis units could allow the current harvest level to be maintained for 10 decades.

• Recommendations for the future

In conclusion, the licensee analysis recommends the following actions be taken before the next timber supply review for the Sunshine Coast:

- forest inventory data should be improved for riparian areas and identification of valid site attributes
- data should be obtained on the dispersion of inoperable productive forest in the timber harvesting land base
- old-growth site indexes should be reviewed
- data should be obtained on managed stand yields to support yield predictions; as well, inputs to managed stand yields, including the impacts of pre-commercial thinning and fertilization, should be reviewed
- further research should be undertaken on appropriate incremental silviculture regimes



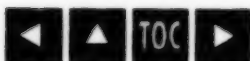


Coast Forest and Lumber Association (CFLA) Report

In its review of the *Timber Supply Analysis* and the *Socio-Economic Analysis*, the CFLA report makes the following points:

- the land base is cut in half for a variety of reasons—inoperable areas, riparian areas, environmentally sensitive areas, unmerchantable forest types—the benefits of which are not examined
- harvest-level reductions are arbitrarily constrained to change in equal percentage amounts per decade, without falling below the estimated long-term harvest level
- generally accepted principles of socio-economic analysis indicate that comparisons of alternative timber harvest forecasts should use net present values, rather than future values as the Ministry of Forests has done in its analysis
- the value of visual quality objectives and forest cover requirements have not been analyzed or proven
- in the *Socio-Economic Analysis*, the use of person-years alone, rather than jobs, to measure employment; the failure to incorporate gross income benefits and taxes; and the inclusion of the public sector as a base industry all lead to an understatement of the true impacts of reductions in the allowable annual cut
- Ministry of Forests employment and income should be acknowledged in any socio-economic assessment of changes to the allowable annual cut

The analysis methods and conclusions put forth in the licensee analysis and the CFLA report are strongly supported by most of the submissions from the forest industry and the Sunshine Coast Forest Coalition.



Sunshine Coast, Summary of Public Input

***Other Public Input***

• Land base

In addition to those respondents who reiterate the CFLA concern that the land base was inappropriately reduced, one submission describes the land base as over-conservative.

Fifteen submissions question the inclusion of the Chapman-Gray watershed as part of the land base. Some specifically point out that Chapman-Gray is designated as a watershed reserve under Section 12 of the *Land Act*.

• Visual quality objectives

Sixty percent of the submissions include comments on visual quality objectives for the Sunshine Coast Timber Supply Area; 25 per cent of those describe visual quality objectives as subjective.

Over 100 of the form letters are concerned that the assignment of visual quality objectives to 55 per cent of the timber harvesting land base will cause a loss of jobs and a reduction in the allowable annual cut.

Some respondents state that cost-benefit analysis has not been done. Given the 24 per cent reduction to the allowable annual cut in 1993, there is a concern that forest workers might be further affected by a harvest-level reduction.

One submission states that the licensee analysis uses a conservative estimate of expected changes to visual quality objectives, yet still indicates the current harvest level could be maintained for four decades. This projection even includes an increase in mid-term levels, relative to the base case.

Some submissions maintain a 5 per cent relaxation of visual quality objectives would allow the current allowable annual cut to be maintained or, possibly, increased. In contrast, other submissions state that a 5 per cent relaxation would not be beneficial; these respondents support an enhancement of visual quality objectives.

Some submissions express concern that the Preservation visual quality objective (as noted in the 1994 draft Sunshine Coast Timber Supply Area data package) has been deleted. These submissions recommend stringent visual quality objectives be reinstated and maintained.

• Inventory information

A number of submissions from individuals, groups and industry stress the importance of having a reliable and technically correct inventory of all forest resources.

One submission recommends that inventory and yield studies be done for all timber types, including those identified as uneconomical because of high elevation, low site quality, or the presence of non-commercial species. In addition, it states the inventory should include the undercut reserve from the Small Business Forest Enterprise Program, plus a reserve of 9 000 cubic metres per year from the five per cent reduction associated with the transfer of tenure from Weldwood of Canada Ltd. to International Forest Products Ltd.

Another submission is concerned that both the short- and long-term supply forecasts were based on the original

inventory; the 1991 reclassification, which was not verified by ground checks; and the determination of the twenty-year timber supply by forest licence-holders in their development plans.

One submission states that the present lack of inventory information concerning cultural heritage resources within traditional territory is a barrier to meaningful involvement in the land-use decision making process.

Two forest industry submissions and one by an environmental interest group express willingness to assist in the process of the next inventory. Another submission suggests using Forest Renewal British Columbia money to undertake an inventory and to project the results of intensive forestry.

- **Age class structure**

One submission states that the retention and maintenance of a more substantial age class-based inventory is essential. To that end, an immediate reduction in the current allowable annual cut is crucial.

- **Site index estimates**

Most of the forest industry submissions support the licensee analysis statement that old-growth site index values likely underestimate future growth. They assert the use of second-growth stands to determine site index is more reliable.

One submission states that by using existing stands to determine site index, the *Timber Supply Analysis* significantly underestimates site index for managed stands, due to the negative bias of over-mature stands. The respondent cites a paired-plot study by Pacific Forest Products in Gold River that shows a difference in site index of up to 9.2 metres at 50 years for hemlock and 5.5 metres for Douglas-fir.

- **Biodiversity**

Over 25 submissions maintain that the *Timber Supply Analysis* does not adequately account for the multiple levels of biodiversity and wildlife values in the Sunshine Coast Timber Supply Area. A number of respondents note that the three alternative harvest scenarios project an overall reduction in natural diversity and a decline in species dependent on old growth. This is held to be unsatisfactory.

Two submissions recommend a four to ten per cent reduction in the land base to sustain natural ecosystems, riparian corridors and biodiversity.

Three submissions express concern about the effect on biodiversity and wildlife habitat of Coast Mountain Hardwoods' proposal to extract 500 000 cubic metres of deciduous timber in cutblocks of up to 200 hectares on low-elevation sites.

- **Old growth**

In addition to the submissions concerned specifically with biodiversity and old growth, ten respondents further support conservation of old growth. Others urge that a full inventory of old growth be completed before any further harvesting is done.

- **Other technical comments**

Three submissions recommend that tree farm licences be included in the analysis, as they contribute to employment and timber supply. One letter further notes that tree farm licenses 10 and 39 make up approximately 33 per cent of the district, with a combined harvest of 436 616 cubic metres. This is equal to 41.5 per cent of the timber supply area allowable annual cut, but it does not contribute to the allowable annual cut.

Many respondents express concern that changes outside the timber supply area are excluded from the impact analysis. They describe timber supply area logs as a vital part of coastal log trading and sales economy.

One submission recommends that a full range of reasonable interpretations of the factors involved in predicting timber supply be made available to the public and decision-makers.





Socio-Economic Analysis

• Employment

Nearly all of the form letters and many other submissions, including those from the Sunshine Coast Forest Coalition and IWA, Local 1-71, express concern over employment issues in the Sunshine Coast Timber Supply Area.

Over a hundred form letters express concern that the assignment of visual quality objectives on 55 per cent of the timber harvesting land base will cause a loss of jobs and an allowable annual cut reduction.

More than 50 per cent of the letters suggest that the unemployment rate, set at 7 per cent in the Socio-Economic Analysis, could actually be 20 per cent or higher. Thirty-eight letters state province-wide reductions in timber supply could affect some of the 970 people employed in the forest industry on the Sunshine Coast.

Other respondents maintain a decrease in the allowable annual cut could reduce wages for loggers. Eleven letters recommend the allowable annual cut not be reduced any further due to the community and lifestyle impacts.

Four letters express concern about a lowered standard of living for forest workers, and four others contend that steady employment will do more to ensure community well-being than a reliance on revenue from tourism.

Forty-four letters cite impacts on local employment arising from changes in other timber supply areas.

Two submissions reiterate the statement in the CFLA Report that forestry-related job projections in the *Socio-Economic Analysis* are underestimated by 50 per cent.

Most of the industry and labour submissions express concern that harvest-dependent employment is underestimated in the *Socio-Economic Analysis* because:

- Howe Sound booming and sorting jobs aren't considered
- the use of "person-years" underestimates the actual number of jobs
- the inclusion of the public sector in the basic economy minimizes the significance of forestry jobs to the local economy

One substantial submission maintains that the *Socio-Economic Analysis* assumes all timber supply area harvesting employment accrues to the region. It goes on to note that forest employment in the Sunshine Coast Regional District declined by 40 per cent over the eight-year period prior to 1993, even though the allowable annual cut remained constant and the population base increased by 25 per cent.

Two submissions contend that the 24 per cent reduction in 1993 has not affected jobs.

Two submissions state that the ratio of 0.57 jobs to 1000 cubic metres is too high. One cites the Resource Systems Management International Report for International Forest Products Ltd. as indicating a coefficient of 0.37 jobs per

1000 cubic metres. This results in a total of 407 direct forestry jobs or person-years of employment for the timber supply area.

Another submission questions the assumption that jobs per cubic metre harvested is a constant through time, unaffected by current and ongoing choices in harvest flows.

Five respondents stress that forests provide jobs in the form of recreation and tourism.

One submission recommends a detailed study of the tourist sector be done to distinguish between revenue from that source and revenue from the forest industry and other sources.

Another submission states that renewable resource industries such as fisheries, tourism and recreation have very little supporting economic or employment data but are described as being important employment sources.

One submission maintains that the creation of economic diversity through small, area-based tenures could improve the ratio of employment to volume.

Three respondents assert that value-added processing is required to increase local employment. In contrast, another respondent contends that the value-added criteria used by the Small Business Forest Enterprise Program removes jobs from the local community.

One letter states that setting sustainable cutting levels now will support long-term timber values and community stability.

• Presentation of data

Some submissions state that the *Socio-Economic Analysis* does not adequately assess alternative timber harvest forecasts, and question why harvest-level increases and decreases are constrained to changing by an equal percentage each decade without falling below the estimated long-term harvest level.

One respondent is concerned that the *Socio-Economic Analysis* supports the status quo, and suggests a true economic analysis would investigate the forces that drive the industry dynamics, rather than assume that society is trapped in the position of protecting forests or protecting jobs and that the goals are mutually exclusive. The submission also states that the incentives of stumpage fee systems and tenure systems should be acknowledged in the analysis and considered adjustable.

• List of contacts

Seven submissions question the list of contacts published in the *Socio-Economic Analysis* and how this affects basic data for decision-making. The Sunshine Coast Forest Coalition and IWA, Local 1-71, provide lists of further contacts. Another submission states more community and environmental groups should have been contacted.

• Recreation

A number of submissions maintain that the already high and increasing recreational use in the Sunshine Coast Timber Supply Area has not been recognized. One respondent further states that there are no indications that consideration is being given to future requirements for the full spectrum of recreational opportunities in the district, particularly along the lower Sunshine Coast.

Many respondents express concern that allocations for other forest values and uses are not examined.

• Watersheds

In addition to those respondents who are concerned that the Chapman-Gray watershed was included in the land base, one submission states that the Clayquot Sound Scientific Panel's precautionary principle must be applied in the Chapman-Gray watershed before any further industrial activity is allowed in this region.





Discussion Paper

The *Discussion Paper* prompted input on several issues.

- **Allowable annual cut adjustment**

Many respondents offer comments regarding the allowable annual cut.

Nine forest industry submissions recommend that consideration be given to a combination of the following to allow the current allowable annual cut of 1.1 million cubic metres to be maintained from one to ten decades:

- re-aggregation of analysis units
- sensitivity of model differences in projecting the base case
- revised volume estimates for unmerchantable stands
- the use of special site indexes, where available,

One of these submissions states that the licensee analysis and other industry reports confirm that the use of increased volumes through commercial thinning, intensive forest practices, and intensive silviculture leading to shorter rotations, would allow the allowable annual cut to be maintained for another decade.

Another submission supports the conclusion in the licensee analysis that the removal of the Tetrahedron area, revised allowable annual cut classification and the use of licensee analysis units and volume predictions would allow the current harvest to be maintained for 10 decades while still providing enough elasticity to absorb additional reductions associated with the Forest Practices Code.

Two submissions point out that the *Timber Supply Analysis* examines harvest flow projections in which the initial harvest level is increased, left constant, and reduced; the *Socio-Economic Analysis*, in contrast, only considers those projections with the initial harvest level left constant and reduced.

Some respondents express concern that the allowable annual cut is based on outdated information.

A number of respondents state that the allowable annual cut should not be lowered and express concern that a reduction in the allowable annual cut could suppress wages for loggers. Eleven form letters urge that the cut not be reduced any further, due to the effects on communities and lifestyles. Many letters note that the cut was reduced by 24 per cent in 1993.

Eight submissions refer to the report, *A Silviculture Analysis of Subalpine Mountain Hemlock Forests*, and recommend that a separate allowable annual cut for the Mountain Hemlock biogeoclimatic zone be established. Others are concerned that the Mountain Hemlock zone, which is the last remaining habitat for the marbled murrelet, will be consumed in a generation or less.

Three submissions state that the Coast Mountain Hardwoods proposal to harvest deciduous was not considered.

Fourteen submissions recommend that the allowable annual cut be reduced. A number of these express concern that corporate pressure may influence the setting of the allowable annual cut, to the detriment of non-timber resources. One submission also points out that the current harvest level is 20 per cent above the low point (876 000 cubic metres per year) of the base case projection.

One submission asserts that the maintenance of the current harvest level over the next ten years would have devastating effects on all non-consumptive functions and values.

Another submission notes that one of the harvest forecasts in the *Timber Supply Analysis* projects a long-term harvest level around 600 000 cubic metres per year; it is suggested that this is the most appropriate and sustainable forecast of those modelled.

• Base case

One respondent expresses concern that the base case compromises biodiversity, social values and the economics of high-value wood production.

Two respondents state that the sensitivity analyses do not take into account two of the biggest variables in assessing demands for timber in the future—fluctuations in log prices and prices for finished products in the domestic and world markets.

One submission comments that the harvest forecasts in the *Timber Supply Analysis* are more sensitive to changes that decrease timber supply than to those that increase it.

A number of submissions are concerned that the Tetrahedron is discussed in the *Discussion Paper* but not taken into account in the *Timber Supply Analysis*.

• Timber utilization

Four submissions recommend that the high-value green-label certified wood products procedure that has been developed in the Vernon Forest District be applied in the Sunshine Coast Forest District. Many respondents state that timber should provide value-added local jobs.

One letter supports redesigning fibre flow patterns so all timber harvested in the timber supply area could be processed within the timber supply area.

• Intensive silviculture

Many respondents comment that the timber supply review documents do not address the issue of improved yields due to commercial thinning and intensive forestry.

One respondent further states that silviculture treatments such as commercial thinning are not being developed in a meaningful way to assist displaced unionized forest workers.

A few respondents assert that intensive silviculture could result in more timber supply area employment.

• Unsalvaged losses

One submission declares that much could be done to utilize an existing 24 000 cubic metres of unsalvaged losses.

- **Integrated resource management**

Four submissions state that forest management should consider ecological sustainability first, then economic sustainability. One respondent is concerned that integrated resource management principles mean that all other values and uses have to accommodate logging.

A number of respondents assert that the Clayoquot Sound Scientific Panel is on the right track and that the precautionary principle should be invoked.

Several respondents are concerned that Local Resource Use Plan areas were included in the review. One further states that watershed units with prior commitments under Local Resource Use Plans involving local residents should be removed from the timber harvesting land base, pending the completion of the planning process(es).

An industry submission concludes that the 24 per cent reduction to the allowable annual cut in 1993 absorbed the impact of the shift to integrated resource management. Accordingly, upward pressures on timber supply mean the current harvest level could be maintained for some time.

- **Other**

Three submissions state that the map on the cover of the Public Discussion Paper suggests Tsy-los Park is in the Sunshine Coast Timber Supply Area.

- **Public Involvement**

Four submissions comment on public involvement in the timber supply review. One asserts that the Sunshine Coast Forest District does not have a good track record of public involvement. By example, the respondent cites the recent transfer of Tree Farm License 10 to International Forest Products Ltd. without First Nations consultation. Another submission states that the Ministry of Forests must adopt a more effective strategy to advise the public regarding the nature of a timber supply review, because most of the individuals the respondent had canvassed did not realize the effect of the review. Another letter suggests the public involvement process should represent all groups, not just some.





Related Processes

Comments on other ongoing government processes in the Sunshine Coast Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future.

- **Protected Areas Strategy**

Many concerns about the effect of the Protected Areas Strategy on the allowable annual cut are raised. Several respondents contend that the impacts of the Protected Areas Strategy should have been included in the review and that special management considerations are needed.

Remove protected areas such as the Tetrahedron Wilderness Protected Area from the timber harvesting land base (approximately 0.4 per cent of the timber harvesting land base).

Protected areas must be designated to ensure balanced and sustainable use of the forested land base in keeping with the diversity of values represented.

The Protected Areas Strategy, biodiversity requirements and multiple use management should be sufficient to address preservation concerns. That portion of the forest left as working forest should be managed to maximize forest product yields.

- **First Nations**

Five submissions state that before any activity takes place on Crown Lands it must be determined whether or not the proposed activity will infringe aboriginal rights and land claims.

- **Forest Renewal British Columbia**

Two submissions state that Forest Renewal British Columbia is a step in the right direction.

- **Forest Practices Code**

Many respondents contend that the effects of the Forest Practices Code should have been incorporated into the review.

More than twenty-five respondents are concerned that riparian zones and requirements for wildlife habitat under the Forest Practices Code were not included in the analysis. One respondent maintains that the harvesting of timber adjacent to riparian areas will negatively affect many wildlife species. A buffer of 15 metres on each side of a stream is totally inadequate for maintenance of habitat. Moreover, reduction of large-diameter snags will result in negative impacts on dependent species.

One industry submission recommends that all possible options be explored to accommodate full implementation of

the Forest Practices Code while maintaining the current harvest level.





Appendix 1





Submissions received by the Sunshine Coast Forest District, the chief forester's office and the Minister of Forests' office.

First Nations

Sliammon First Nations

Form Letters

184

Individuals

34

Industry

Canadian Forest Products Ltd.
Coast Forest and Lumber Association
Coastal Community Small Quota Holders Association
International Forest Products Ltd.
IWA Local 1-71 (two submissions)
MacMillan Bloedel Limited, Stillwater Division
Pacific Forest Products Ltd.
Sladey Timber Ltd.
Sunshine Coast Community Adjustment Society
Terminal Forest Products Ltd.

Interest Groups

Cortes Island Forest Committee
Elphinstone Electors' Association
Friends of Caren
Pender Harbour and District Wildlife Society
Sunshine Coast Forest Coalition (two submissions)
Sunshine Coast Natural History Society
Surge Narrows Community Association
Tetrahedron Alliance
Tuwaneke Ratepayers Association

Local Government

Corporation of the District of North Cowichan
Sunshine Coast Regional District (two submissions)

Response Forms

6 individual
7 form



